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December 11, 2024

Via ECF

The Honorable Jessica G.L. Clarke
United States District Judge – Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Rapaport v. Epstein, 24-cv-7439-JGLC; Rapaport v. Epstein, 23-cv-6709-JGLC (Related)

Dear Judge Clarke:

We write on behalf of Defendant Mitchell Pallaki to respectfully request that Mr. Pallaki's deadline for responding to the complaint be extended until January 30, 2025.

The current deadline for responding to the complaint is December 17, 2024; this is Mr. Pallaki's first request for an extension of this deadline; and the parties do not have any scheduled appearances before the Court. Given that this is a newly filed action, the fact that Mr. Pallaki's counsel has just been retained and will need time to evaluate the complaint, and the upcoming holidays, we respectfully submit that an adjournment, until January 30, 2025, of the deadline for responding to the complaint is warranted.

Plaintiff Gideon Rapaport does not consent to this request. When we solicited his position on this common courtesy, Mr. Rapaport stated that he would consent to our requested extension only if we committed to extending his future deadlines by the same amount of time, should he need any such extension(s). We explained that we would be happy to extend him courtesies regarding timing and/or deadlines in the future—as we would for any adversary or opposing counsel—but that we could not commit to an extension of an unspecified future deadline for unknown reasons. Mr. Rapaport was unsatisfied with our solution and maintained his initial position. Additionally, he provided several other reasons for withholding consent, including that (1) Mr. Pallaki should have retained counsel and prepared a defense before being served and (2) our firm should be able to respond to a complaint within twenty-one days.

For the reasons noted above, we respectfully request that the Court grant our request for an adjournment of the deadline for responding to the complaint.

We thank the Court for its consideration.

Respectfully submitted,

Levine Lee LLP

/s/ Seth L. Levine

Seth L. Levine

Steven W. Kessler

cc: *Pro Se Plaintiff Gideon Rapaport (via ECF)*